

Ronald E. Synder, M.D.  
08/14/2024

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1 UNITED STATES DISTRICT COURT  
2 IN AND FOR THE DISTRICT OF WYOMING  
3 STEPHANIE WADSWORTH, individually )  
and as Parent and Legal Guardian )  
4 of W.W., K.W., G.W. and L.W. )  
minor children, and MATTHEW )  
5 WADSWORTH, ) Case No.:  
Plaintiffs, ) 2:23-cv-00118-NDF  
6 vs. )  
WALMART, INC. and JETSON )  
7 ELECTRIC BIKES, LLC, )  
Defendants. )

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Wednesday, August 14, 2024

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Videoconference deposition of

17

RONALD E. SYNDER, M.D. was taken via Zoom,

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before Elizabeth M. Kondor, Certified Court

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Reporter and Notary Public, on the above date,

20

commencing at 11:00 a.m.

21

22

LEXITAS LEGAL PHILADELPHIA

23

1600 MARKET STREET, SUITE 1700

24

PHILADELPHIA, PENNSYLVANIA 19103

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(215) 504-4622

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1 Q. You have not done a life care plan  
2 for Weston Wadsworth, correct?

3 A. That is correct.

4 Q. And you're not offering any opinions  
5 in this case as to a potential life care plan  
6 for Weston Wadsworth?

7 A. Correct, not at this point, but I may  
8 be asked in the future, but at this point, I  
9 have not.

10 Q. Okay.

11 And just so we're perfectly clear as  
12 to what I am questioning you on here today, the  
13 only opinions that you are offering in this case  
14 presently is the life care plan opinions for  
15 Stephanie Wadsworth, true?

16 A. That is true. That is correct.

17 Q. And although you met the Wadsworth  
18 children on your home visit, you have not done a  
19 life care plan for any of them, including  
20 Weston, and are not offering any opinions here  
21 today on any life care plan issues related to  
22 any other members of the Wadsworth family,  
23 correct?

24 A. That is correct.

25 Q. And I understand that you are based

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1 just as a matter of housekeeping, why don't we  
2 mark this as the next exhibit in line. And I'll  
3 pull it up.

4 (Exhibit 62, 6/6/24 letter to C.  
5 LeChapelle from R. Snyder, is received and  
6 marked for identification.)

7 Q. Dr. Synder, if you could confirm - so  
8 this would be Exhibit 62 - this is the letter to  
9 Dr. LeChapelle with the accompanying  
10 questionnaire, you probably can't see it, but it  
11 is 19 pages long. Is that the questionnaire  
12 that you would have sent to Dr. LeChapelle?

13 A. That is correct. And we did get  
14 notification they had received it by certified  
15 mail so they did receive it.

16 Q. And this would have been sent on June  
17 6, 2024, as you noted, via certified mail and  
18 through the certified mail process, as well as  
19 it sounds like your recent conversation with his  
20 office, he did receive this, correct?

21 A. Correct.

22 Q. Hold on one second. I apparently  
23 didn't shut my office phone off.

24 Sorry about that.

25 Have you ever spoken with

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1 Dr. LeChapelle?

2 A. I have not.

3 Q. Has anyone from your office spoken  
4 with Dr. LeChapelle?

5 A. We have not. Yesterday I reached out  
6 saying, Hey, where is this? And I think one  
7 person spoke to one of his secretaries or  
8 whatever. They did some research. And I was  
9 asked to -- or they were asked to take this  
10 report and fax it to them, which was faxed  
11 yesterday to them.

12 Q. And at least, as you sit here today,  
13 I think you previously testified, you don't have  
14 a completed copy of the questionnaire that you  
15 sent to Dr. LeChapelle?

16 A. I do not have a returned copy, that's  
17 correct.

18 Q. Okay.

19 And when you say "returned," just so  
20 we're speaking the same language, you don't have  
21 a returned or a completed copy of this  
22 questionnaire, correct?

23 A. Correct, yes. I have what I sent  
24 them and I expect for them to sign it, complete  
25 it and return it back to me. And I do not have

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1 anything of that nature, that's correct.

2 Q. Are there any of Stephanie  
3 Wadsworth's treating physicians that you --  
4 strike that.

5 Have you spoken with any of Stephanie  
6 Wadsworth's treating physicians?

7 A. I have not. After I saw the patient,  
8 I had some discussions with plaintiffs' counsel,  
9 as far as needing to get some additional  
10 clarification, because I'm not a plastic  
11 surgeon.

And in order for me to put particular  
12 procedures in, it would be inappropriate for me  
13 to add those procedures.

14 And you'll see in my life care plan,  
15 I have a list of procedures that I presume the  
16 patient is going to be needing, but I could not  
17 put in because that's outside of my wheelhouse.  
18 So I presume in the future, there will be some  
19 additional experts or counsel will set up an  
20 appointment for me to speak with those treating  
21 physicians. But at this point, none of that has  
22 been arranged at this point.

23 Q. And it sounds like Dr. LeChapelle is  
24 the only one that you've actually reached out to  
25 as part of your work in this case?

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1 like Mrs. Wadsworth, there have been the  
2 occasional patients that you've treated even in  
3 your private practice with burns, fair?

4 A. Absolutely fair.

5 Q. And in what you do as a life care  
6 planner, even if you don't have an abundance of  
7 patients in private practice with burns that  
8 you're treating, as a life care planner, do you  
9 speak with and learn from some of those  
10 specialists that are treating the particular  
11 patient whom you're asked to make  
12 recommendations for future care?

13 A. That's correct.

14 Q. You were asked earlier on in the  
15 deposition about the scope of your work in this  
16 case. And you have not prepared a life care  
17 plan for Weston, correct?

18 A. That's correct.

19 Q. And, in fact, I instructed you to  
20 focus your efforts on preparing your  
21 recommendations and any opinions you had as to  
22 Mrs. Wadsworth's future medical care needs,  
23 fair?

24 A. That's correct.

25 Q. If, after receipt of depositions of